REMARKS/ARGUMENTS

These remarks are made in response to the Office Action of May 16, 2006 (Office Action). As this response is timely filed before the expiration of the 3-month shortened statutory period, no fee is believed due. However, the Office is expressly authorized to charge any deficiencies or credit any overpayment to Deposit Account No. 50-0951.

Each of the pending claims were rejected based upon new grounds of rejection, as stated at page 10 of the Office Action. Claims 1-8, 11-13, 15-17, 46,-53, 56-58, 60-62, 64-66, and 69-71 were rejected under 35 U.S.C. § 103 (a) as being unpatentable over U.S. Patent No. 6,064,959 to Young *et al.* (hereinafter Young), in view of U.S. Patent No. 6,430,551 to Thelen et al. (hereinafter Thelen). Claims 14 and 59 were rejected under 35 U.S.C. § 103 (a) as being unpatentable over Young, in view of Thelen, as applied to claims 1 and 46, and further in view of U.S. Patent No. 5,799,273 to Mitchell *et al.* (hereinafter Mitchell). Claims 18 and 63 were rejected under 35 U.S.C. § 103 (a) as being unpatentable over Young, in view of Thelen applied to claims 1 and 46, and further in view of U.S. Patent No. 5,680,511 to Baker *et al.* (hereinafter Baker).

Applicants have amended independent Claims 1, 46, and 64 to further emphasize certain aspects of the invention. The claim amendments, as discussed herein, are fully supported throughout the Specification. No new matter has been added through the claim amendments.

I. Applicants' Invention

At this juncture, it may be helpful to reiterate certain aspects of Applicants' invention. One embodiment of the invention, typified by Claim 1, as amended, is a method of speech recognition. The method can include receiving non-voice input, such

as text contained in an e-mail, information in a document attached to an e-mail, information in a document viewed on a display of a computer system, information in a plurality of linked documents accessible to the computer system, information in a spread sheet executing on the computer system, facsimile information received via a facsimile device connected to the computer system, call center information received via a calling device connected to the computer system, and/or information recorded by a web browser executing on the computer system. (See, e.g., Specification, p. 8, line 17 – p. 9, line 16.) Such input is, by definition, randomly received in the sense that it is not anticipated what information will be received in an e-mail, for example. Similarly, it can not be *a priori* known what type of information will be received from a call center, for example. Indeed, none of the various identified sources of input provide information whose event context is known beforehand.

Based upon the randomly received information, according to this embodiment, a word list defines, and can be stored as, a context-enhanced database. Alternatively, the word list so created can be added to, and thereby modify, an existing context-enhanced database. (See, e.g., Specification, p. 10, lines 9-19.)

The method can further include preparing a first textual output from a speech signal by performing a speech recognition task to convert the speech signal into the first textual output. The context-enhanced database can then be accessed to improve the speech recognition rate. The speech signal can be parsed into a plurality of computer processable speech segments. The first textual output can include a plurality of text segments, each corresponding to one of the computer processable speech segments. Selective ones of the text segments can be generated by matching each computer processable speech segment against an entry within the context-enhanced database. Moreover, the context-enhanced database can include a plurality of entries, each

comprising a speech utterance and a corresponding textual segment for the speech utterance. Additionally, the method can include enabling the editing of the first textual output to generate a final, voice-generated output.

II. The Claims Define Over The Prior Art

Independent Claims 1, 46, and 64 were each rejected as being unpatentable over Young in view of Thelen. Young is directed to a system and method for correcting incorrect text associated with errors occurring during a computer-implemented speech recognition process. As noted in the Office Action, Young's method entails activating a "constraint grammar," activation occurring when a user "opens" a particular application program with which the constraint grammar is "associated." (See Col. 4, line 52 – Col. 5, line 4.) As further noted in the Office Action, such a grammar can have its own vocabulary based upon a "dictation topic." Based on the specific topic, the vocabulary can comprise terms pertinent to a specific topic. For example, one vocabulary can comprise medical terms. Another can comprise, for example, legal terms. (See Col. 5, lines 55-63; and Col. 6, lines 33-40.)

As these portions of the references explicitly reveal, Young's grammars and vocabularies are each created in accordance with a particular application program or a particular topic. Both types of vocabularies in Young, however, are fundamentally different from the context-enhanced database created by Applicants' invention. With respect to the first of Young's vocabularies, it is pre-determined in accordance with the particular application program to which it is associated. As noted both above and in the Office Action, the vocabulary is opened by a user activating the particular application program. It follows that if the "input" is the act of opening the application program, then the vocabulary already exists when the program is opened. Likewise, with respect to the

second of Young's vocabularies, the dictation vocabulary, this type of vocabulary is also pre-determined and created before any event that activates the vocabulary. The dictation vocabulary is determined solely by the particular topic with which the dictation vocabulary is associated.

It follows, therefore, that Young nowhere teaches or suggests either the type or the manner of creating a context-enhanced database as taught by Applicants' invention. Specifically, Young does not teach or suggest creating a word list defining a context-enhanced database based upon randomly received input (e.g., text received in an e-mail.) Nor does Young teach or suggest modifying an existing context-enhanced database by adding a word list created based upon randomly received input. E-mail text includes terms that do not necessarily correspond to a predefined topic; indeed, an e-mail may include terms covering many topics. In any event, when such input is randomly received, there is no opportunity *a priori* to have created the word list, because it is not known beforehand what words will be received. Such words may be personal names, disparate locations, or any other such non-topic-specific words.

Such words will not be found in Young's vocabulary that corresponds to an existing application program; the application program, not randomly received input, determines the vocabulary. Nor will such words be found in Young's dictation grammar, since the grammar is determined solely by the particular topic (e.g., medical, legal, etc.) The topic determines the grammar, not randomly received input.

It follows that Young nowhere teaches or suggests that a precise, unique word list can be created based on specific information received in any of the various forms such as text contained in an e-mail, information in a document attached to an e-mail, information in a document viewed on a display of a computer system, information in a plurality of linked documents accessible to the computer system, information in a spread sheet

executing on the computer system, facsimile information received via a facsimile device connected to the computer system, call center information received via a calling device connected to the computer system, and/or information recorded by a web browser executing on the computer system. As already noted, the information received from such sources can not be known before hand, and thus when it is received, it is randomly received. Young, however, nowhere discloses creating a context-enhanced database from a word list based on such randomly received input.

Thelen is cited as teaching that a vocabulary or language model can be created from documents distributed over several servers connected over the Internet. Thelen is silent, though, about creating either a vocabulary or language model based upon input received, let alone input randomly received. As suggested in Thelen, documents are obtained over the Internet and then the vocabulary or language model is created.

More fundamentally, Thelen is similar to Young in that the documents deemed relevant for creating the vocabulary or language model are those that correspond to a predetermined topic or category. Specifically, as noted in the Office Action, Thelen suggests that vocabulary or language model is created based upon documents relevant to a specific category of user, such as a surgeon, radiologist, or legal practitioner. Nowhere, though, does Thelen teach or suggest creating or modifying a context-enhanced database using a unique word list based upon randomly received input.

Accordingly, neither Young nor Thelen, alone or in combination, teaches or suggests every feature recited in independent Claims 1, 46, and 64, as amended. Applicants respectfully submit, therefore, that the claims define over the prior art. Applicants further respectfully assert that whereas each of the remaining dependent claims depends from one of amended Claims 1, 46, or 64 while reciting additional features, the dependent claims likewise define over the prior art.

CONCLUSION

Applicants believe that, in view of the claim amendments presented herein, this application is now in full condition for allowance, which action is respectfully requested. The Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

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